

1 ERIK B. LEVIN  
CABN 208274  
2 JOSHUA L. DRATEL  
*Pro Hac Vice*  
3 LAW OFFICE OF ERIK B. LEVIN  
2001 Stuart Street  
4 Berkeley, California 94703  
Telephone (510) 978-4778  
5 Facsimile (510) 978-4422  
erik@erikblevin.com  
6  
Counsel for Adam Shafi  
7  
8

9 IN THE UNITED STATES DISTRICT COURT  
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
11

12 UNITED STATES OF AMERICA,  
13 Plaintiff,  
14 v.  
ADAM SHAFI,  
15 Defendant  
16

) NO. 15 Cr. 582 WHO

) UNOPPOSED ADMINISTRATIVE  
) MOTION AND ORDER SEALING EX  
) PARTE COURT DOCUMENTS

) Date: February 18, 2016  
) Time: 1:30 p.m.  
)

17 PLEASE TAKE NOTICE that on February 18, 2016 at 1:30 p.m., defendant  
18 Adam Shafi will move this Court to file *ex parte* and under seal and FILTER 00002  
19 through FILTER 00009, which counsel has lodged with this Court under seal. The  
20 government does not oppose the motion and the parties agree that the motion may be  
21  
22

1 granted pursuant to this unopposed motion and the declaration of counsel below, and  
2 without oral argument.

3 Mr. Shafi seeks an order permitting him to file under seal and *ex parte* from the  
4 prosecution FILTER 00002 through 00009 because they contain privileged attorney-  
5 client communications and constitute attorney work-product. *See* L.R. 56-1(b).

6 **Declaration of Counsel**

7 1. Along with Joshua L. Dratel, I represent Mr. Adam Shafi in the above-  
8 captioned matter and I submit this declaration in support of Mr. Shafi's Unopposed  
9 Administrative Motion to Seal Court Documents. I present the following based on  
10 information and belief.

11 2. Mr. Shafi was arrested on a Complaint July 3, 2015, that alleged an attempt  
12 to provide material support to a foreign terrorist organization in violation of 18 U.S.C. §  
13 2339B. [Dkt. 1]. Mr. Shafi has been detained since his arrest at Alameda County's Glenn  
14 Dyer Jail.

15 3. According to Alameda County Sheriff's Office Lieutenant Dan Brodie, on  
16 December 17, 2015, representatives of the Sheriff's Office searched Mr. Shafi's cell and  
17 confiscated a notepad containing writings and drawings, which it promptly turned over to  
18 the FBI. [Dkt. 47 at ¶¶7-9].

19 4. FBI Agent Christopher Monika confirms that the Alameda County Sheriff's  
20 Office provided the material to the FBI. [Dkt. 38-1 at ¶ 5b].

